

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

In the Matter of :)	Docket Nos.	CP06-54-000
BROADWATER ENERGY)		CP06-55-000
LIQUEFIED NATURAL GAS PROJECT)		CP06-56-000

MOTION TO INTERVENE

Pursuant to Rule 212 and 214 of the Rules and Practice and Procedure,¹ Connecticut Fund for the Environment/Save the Sound ("CFE/Save the Sound"), respectfully moves to intervene in the above Federal Energy Regulatory Commission ("Commission") captioned proceedings.

In support of this Motion to Intervene, Connecticut Fund for the Environment respectfully states:

1. CFE is a corporation duly organized and existing under the laws of the State of Connecticut with its principal office located at 205 Whitney Avenue, New Haven, Connecticut.
2. Save the Sound is a regional program of CFE that is dedicated to the restoration, protection, and appreciation of Long Island Sound and its watershed
3. The following persons are designated to receive service in these proceedings:
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¹ 18 C.F.R. §§ 385.212 and 385.214 (2005).

I. Statement of Issues

a. Broadwater Energy LLC ("Broadwater Energy") filed an application in Docket No. CP06-54-000, pursuant to Section 3 of the National Gas Act ("NGA"), for authorization to construct and operate a Liquefied Natural Gas ("LNG") terminal and associated facilities in Long Island Sound on January 30, 2006.

b. Broadwater Pipeline LLC ("Broadwater Pipeline") filed an application in Docket Nos. CP06-55-000 and CP06-56-000, pursuant to Section 7(c) of the NGA, Part 157 subpart A of the Commission's regulations (a certificate of public convenience and necessity), and Part 157, Subpart F (blanket construction certificate) for authorization to construct, own, operate, and maintain a subsea pipeline to transport natural gas from the LNG terminal to the existing Iroquois pipeline on January 30, 2006.

c. CFE/Save the Sound moves for leave to intervene in the above captioned dockets Pursuant to Rules 212 and 214 of the Rules of Practice and Procedure of the Commission.

II. Motion to Intervene

CFE/Save the Sound has worked to restore and protect Long Island Sound for over 33 years. Together with its parent organization CFE, it represents approximately 7000 New York and Connecticut members.

On January 30, 2006 Broadwater Energy filed an application with the Commission seeking authorization to site, construct and operate a Floating Storage and Regasification Unit and its accompanying facilities (collectively "Broadwater Complex"). Similarly, on January 30, 2006 Broadwater Pipeline filed an application seeking authorization to construct a natural gas pipeline to tie the Broadwater Complex to the Iroquois pipeline.

The Broadwater Complex is proposed for the middle of Long Island Sound, in New York state waters. It will be approximately 11 miles south of the nearest Connecticut coastline and nine miles north of the New York shore of Long Island. The Broadwater Complex is expected to be serviced by 2 to 3 weekly tanker shipments of LNG. These tankers will enter the waters of Long Island Sound through the eastern most access point--The Race. The security zones associated with the proposed project will lie within the territorial limits of the State of New York and, in part, within the territorial limits of the State of Connecticut. Such zones will affect important marine and other natural resources and may impact uses including but not limited to commercial shipping, recreational boating, and commercial and recreational fishing within both States. These resources are held in public trust for the residents of New York and Connecticut, thus the proposal raises important legal issues concerning the rights of both states' citizens.

Additionally, the construction, operation, and maintenance of the Broadwater Complex and the Broadwater Pipeline's 30-inch, 22-mile subsea pipeline may potentially impact the water quality, habitats and marine resources of Long Island Sound.

CFE/Save the Sound actively engages in the restoration and protection of Long Island Sound and its watershed, thus the Commission's findings and orders in proceedings on this Broadwater Complex, associated facilities and pipeline infrastructure, which relate to the importation and conveyance of natural gas in and through Long Island Sound, may directly and immediately affect CFE/Save the Sound and the approximately 7000 New York and Connecticut members it represents, many of whom reside near and recreate in Long Island Sound. CFE/Save the Sound is an environmental, non-profit, advocacy organization that has opposed the Broadwater Complex and the Broadwater Pipeline, as such no other party can adequately represent CFE/Save the Sound's interest. It is in the public interest that CFE/Save the Sound be allowed to participate as a party, therefore the Commission should allow CFE/Save the Sound to intervene in these proceedings.

Conclusion

WHEREFORE, CFE/Save the Sound respectfully requests that the Commission issue an order permitting CFE/Save the Sound to intervene in this proceeding with full rights as a party.

Respectfully submitted,

/s/

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Dated: March 10, 2006

CERTIFICATE OF SERVICE

Pursuant to Rule 2010 of the Commission's Rules of Practice and Procedure, I hereby certify that I have this day served the foregoing document on each person designated on the official service list compiled by the Secretary in these proceedings.

Dated at New Haven, Connecticut this 10th day of March, 2006.

/s/

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